

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

RYAN DEVEREAUX, et al.,	)	
	)	
Plaintiffs,	)	
	)	Cause No. 4:15cv-00553-RWS
v.	)	
	)	
ST. LOUIS COUNTY, MISSOURI, et al.,	)	
	)	
Defendants.	)	

ANSWER OF DEFENDANT ST. LOUIS COUNTY, MISSOURI

COMES NOW Defendant St. Louis County, Missouri, and for its responsive pleading to the Complaint answers by stating that St. Louis County, Missouri:

Introduction

1. Denies Paragraphs 1 through 5.

Jurisdiction and Venue

2. Admits Paragraphs 6 through 10.

Parties

3. Lacks sufficient knowledge or information to form a belief as to the veracity of Paragraphs 11 through 16, and so denies them.
4. Admits the allegation of Paragraph 17 to the extent that St. Louis County, Missouri is a charter county of the State of Missouri (rather than a municipal corporation).
5. Denies Paragraphs 18 and 19.

Facts

6. Lacks sufficient knowledge or information to form a belief as to the veracity of Paragraphs 20 through 23, and so denies them.
7. Denies Paragraph 24.
8. Lacks sufficient knowledge or information to form a belief as to the veracity of Paragraphs 25 through 68, and so denies them.
9. Admits Paragraphs 69 and 70.
10. Denies Paragraphs 71 through 77.
11. Lacks sufficient knowledge or information to form a belief as to the veracity of Paragraph 78, and so denies it.
12. Deny Paragraph 79.
13. Lacks sufficient knowledge or information to form a belief as to the veracity of Paragraphs 80 and 81, and so denies them.
14. Denies Paragraphs 82 through 84.

Count I

15. With respect to Paragraph 85, County repeats its earlier responses.
16. Denies Paragraphs 93 and 94.

Count II

17. With respect to Paragraph 90, County repeats its earlier responses.
18. Denies Paragraph 91.
19. Admits Paragraph 92.
20. Denies Paragraphs 93 and 94.

Count III

21. With respect to Paragraph 95, County repeats its earlier responses.

22. Denies Paragraphs 96 through 99.

Count IV

23. With respect to Paragraph 100, County repeats its earlier responses.

24. Denies Paragraphs 101 through 104.

Count V

25. With respect to Paragraph 105, County repeats its earlier responses.

26. Admits Paragraph 106.

27. Denies Paragraphs 107 through 109.

Count VI

28. With respect to Paragraph 110, County repeats its earlier responses.

29. Admits Paragraph 111.

30. Denies Paragraphs 112 through 114.

Count VII

31. With respect to Paragraph 115, County repeats its earlier responses.

32. Denies Paragraphs 116 through 125.

Count VIII

33. With respect to Paragraph 126, County repeats its earlier responses.

34. Denies Paragraphs 127 through 129.

Count IX

35. With respect to Paragraph 130, County repeats its earlier responses.

36. Lacks sufficient knowledge or information to form a belief as to the veracity of Paragraphs 131 through 136, and so denies them.

37. Denies Paragraph 137.

Count X

38. With respect to Paragraph 138, County repeats its earlier responses.

39. Lacks sufficient knowledge or information to form a belief as to the veracity of Paragraphs 139 through 144, and so denies them.

40. Denies Paragraph 145.

Count XI (misabeled as Count XII)

41. With respect to Paragraph 146, County repeats its earlier responses.

42. Lacks sufficient knowledge or information to form a belief as to the veracity of Paragraphs 147 through 156, and so denies them.

43. Denies Paragraph 157.

Count XII (misabeled as Count XIII)

44. With respect to Paragraph 158, County repeats its earlier responses.

45. Lacks sufficient knowledge or information to form a belief as to the veracity of Paragraphs 159 through 168, and so denies them.

46. Denies Paragraph 169.

WHEREFORE, Defendant St. Louis County asks that each count of the Complaint be dismissed as to it, and for such other relief as the Court deems appropriate in the circumstances.

PETER J. KRANE  
COUNTY COUNSELOR

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A copy of the foregoing was filed April 9, 2015 with the Court's electronic filing system.

/s/ Michael A. Shuman